



125 BROAD STREET, NEW YORK, NY 10004 TEL 212 471-8500 FAX 212 344-3333 WWW.HERZFELD-RUBIN.COM

January 25, 2016

Michael R. Rudick
Direct Line: (212) 471-8473
mrudick@herzfeld-rubin.com

Via ECF

Hon. Vincent L. Briccetti
United States District Court
Southern District of New York
300 Quarropas St.
White Plains, New York 10601-4150

Re: Goldstein, et al. v. Solucorp, et al., Case No. 7:11-cv-06227 (VLB)

Dear Judge Briccetti:

We represent plaintiffs in this matter, and are presently scheduled to appear before this Court at 9:30 a.m. on January 26, 2016 for a hearing on plaintiffs' recently-filed Order to Show Cause for Default Judgment against defendant Stephen DeGroat, as Commissioner of Finance of Rockland County, in his capacity as Administrator of the Estate of Joseph Kemprowski ("DeGroat"). We write to request that this hearing be adjourned to the morning or early afternoon of January 28, 2016, as the parties in this action have already been scheduled to appear in White Plains that day for a settlement conference before Magistrate Davison at 2:30 p.m.

The deadline for the submission of papers in opposition to plaintiffs' Order to Show Cause was January 15, 2016. No opposition has been submitted to date. Counsel for DeGroat has been personally advised of this adjournment request, and has been copied on this letter.

Respectfully submitted

A handwritten signature in black ink, appearing to read 'MR', is written over the typed name of Michael R. Rudick.

Michael R. Rudick (MR-1785)

cc: All Parties Via ECF

John Carlson, Esq.
5 Winifred Drive
Merrick, NY 11566

HERZFELD & RUBIN, P.C.
1225 FRANKLIN AVE, SUITE 315
GARDEN CITY, NY 11530
TELEPHONE: 212-471-3231

CHASE KURSHAN HERZFELD & RUBIN, LLC
354 EISENHOWER PARKWAY, SUITE 1100
LIVINGSTON, NJ 07039-1022
TELEPHONE: 973-535-8640

HERZFELD & RUBIN, LLP
1925 CENTURY PARK EAST
LOS ANGELES, CA 90067
TELEPHONE: 310-553-0451

RUBIN MEYER DORU & TRANDAFIR
SOCIETATE CIVILA DE AVOCATI
7, STRADA PUTUL CU PLOPI
BUCHAREST 1, ROMANIA
TELEPHONE: (40) (21) 311-1460



Israel Tyberg
123 Avenue J
Brooklyn, NY 11230

Richard Greene
3972 Southwest 135 Avenue
Davie, FL 33330

Ben Selig, Esq.
Hurley Fox & Selig
**Attorneys for Stephen DeGroat,
as Commissioner of
Finance of Rockland County**
65 South Liberty Dr.
Stony Point, New York 10980-2321